Dames & Moore 812 Anacapa Street, Suite A Santa Barbara, CA 93101 (805) 963-967-567-6

May 20, 1986

Redevelopment Agency City of Santa Fe Springs 11710 Telegraph Road Santa Fe Springs, CA 90670

Attention: Mr. Richard Weaver

Director

Subject: Review

Previous Site Assessment and Site Remediation Procedures and Additional Site Recommendations Toxo Spray Dust, Inc. Site Santa Fe Springs, California

INTRODUCTION

Dames & Moore is pleased to provide the results of our review of the previous site assessment and site remediation procedures conducted at the Toxo Spray Dust, Inc. site at 12651 E. Los Nietos Rd., Santa Fe Springs, CA. To accomplish this we have reviewed the information you provided us April 21, 1986. We also interviewed Mr. Roy Kobashigawa of the Los Angeles County Department of Health Services (LACDOHS) and Mr. Lewis Proctor of Toxo Spray Dust, Inc. and toured the site on May 6, 1986. In addition, we have evaluated the site with respect to its proximity to the adjacent Waste Disposal Inc. site pursuant to the policy statement adopted by the Redevelopment Agency and City Council for the Norwalk Boulevard Redevelopment Project.

SITE HISTORY

Toxo Spray Dust, Inc. has been using the subject site for the mixing of liquid and dry pesticides for agricultural use since the early 1950s.

DRAFT

- On November 4, 1983, during a routine site inspection by Mr. Kobashigawa, pesticides were observed on the soil surface in the area behind the operations building (see Figure 1). Blending and storage areas were not lined or bermed. A Notice of Violation to abate the situation was issued.
- On January 20, 1984, Mr. Kobashigawa took surface soil samples at seven locations scattered around the property. The LACDOHS laboratory analyzed the samples and the results indicated minor to significant (1.5 ppm to 435.0 ppm) levels of organophosphate pesticides (diazenon, parathion, and ethion); low levels (3.8 ppm to 7.6 ppm) of DDT; no evidence of chlorinated pesticides (chlordane, heptachlor and toxaphene); and, no evidence of carbamates. The contamination was concentrated in the areas behind the platform at the rear of the building.
- On May 8, 1984, the LACDOHS issued an order to Toxo Spray Dust, Inc. to terminate discharges and abate the contamination, preferably by excavation.
- On June 12, 1984, a second set of samples from four borings taken at depths of 12 to 26 inches was taken by Mr. Kobashigawa. The samples were split and analyzed at the LACDOHS laboratory and by IT Analytical Services. The results were similar from both laboratories and indicated a small area immediately behind the platform that was heavily contaminated with organophosphate pesticides (200 ppm to 3300 ppm).
- On July 9, 1984, the attorneys for Toxo Spray Dust, Inc. notified LACDOHS of the results of the sample analyses and proposed the following abatement actions:
 - "Remove the existing dock;
 - Lime the area around the dock and pump area;
 - Cement the entire rear area of the facility; and
 - Berm the perimeter of the entire facility."

The liming treatment was to neutralize the organophosphate pesticides in the soil.

- During July 1984 the platform and ramp on the rear of the building were removed and the entire area in the rear of the building had lime applied and mixed with the soil.
- On September 20, 1984, a third set of samples was taken by Mr. Kobashigawa from six borings in the area behind the building. The borings were located adjacent to the building and in the area of previous high contamination levels. The LACDOHS laboratory analyzed the samples and the results indicated significant reductions in the organophosphate contamination levels. Diazenon levels were not detectable or recorded only in trace amounts and Ethyl Parathion levels were mostly not detectable but did range up to 40 ppm.
- During October 1984, the entire rear area of the facility was covered with a 5-inch thick concrete slab with 6-inch high berms (see Figure 1).
- On November 20, 1986, Mr. Kobashigawa reinspected the Toxo Spray Dust, Inc. site and, based on his observations and the results of the September 20, 1984, laboratory analyses, officially rescinded the November 4, 1983 Notice of Violation.
- On May 6, 1986, Mr. Gerald Hels of Dames & Moore interviewed Mr. Kobashigawa of LACDOHS and Mr. Lewis Proctor of Toxo Spray Dust, Inc., and toured the site. Mr. Kobashigawa indicated that no further action has been taken by LACDOHS nor is any further action anticipated. Mr. Proctor indicated (and it was readily observed) that Toxo Spray Dust, Inc. is no longer in operation due to the inability to obtain liability insurance. The pesticide mixing equipment was in the process of being removed from the site. Mr. Proctor intends to retain ownership of the site, dismantle the existing metal building and construct a new building to be used for light industrial operations. He indicated that he has already retained an architect to complete a

design for the site. During our tour of the site, it was observed that all pesticide mixing and handling equipment has been removed and the inside of the building thoroughly cleaned. The entire rear working area has been concreted into a containment area. There were no pesticide containers present. The concrete appears structurally sound and there was no evidence of spills or leaks. The above-ground talc tank was empty and Mr. Proctor stated that the three underground tanks that held gasoline, diesel fuel and xylene were also empty. A portion of the building is built on a raised, open foundation. Although not carefully inspected, the soils under that portion of the building appeared to be covered with sawdust (from a nearby wood working facility) and light colored dust. The source of the dust is unknown but may be residual seepage from the dry blending area through the wooden floor.

ADDITIONAL SITE RECOMMENDATIONS

It is our understanding that the Los Angeles County Department of Health
Services is satisfied that the lime treatment of the contaminated soils and the
installation of the bermed containment area has abated the existing problems
and will prevent any future problems from occurring at the Toxo Spray Dust,
Inc. site. Since pesticide handling and mixing operations at the site have
been terminated and the site appeared generally clean during our tour, there is
little or no potential for future pesticide contamination at the site. Lastly,
the procedure of lime treatment of organophosphate pesticides in soil is an
accepted technique.

We recommend that, prior to building demolition, two samples of the wood from the floor in the dry blending area by analyzed for organophosphate pesticides. If the results show no detectable concentrations, then the building can be routinely demolished. If the results show detectible concentrations, then additional sampling and analysis and the proper disposal of all contaminated wood will be required. In addition, the soils beneath the wooden floor area should be sampled. We recommend samples be taken at the surface, one foot deep and two feet deep at two locations. The samples should be analyzed for organophosphate pesticides. If the results are negative construction of the new

facility can proceed. If the results are positive, the soils should be treated with lime (ensuring that the lime is mixed with the soils to the depth of the limits of contamination). After 45 to 60 days the site should be resampled and if negative, construction can occur; if positive, the site should be retreated with lime. In addition, we recommend that the three underground tanks at the site be decommissioned in accordance with applicable State and Los Angeles County regulations.

With respect to potential health hazards on the Toxo Spray-Dust, Inc., site from the adjacent Waste Disposal Inc. site, it is our judgement that currently a potential hazard may exist from subsurface migration of vapors from the Waste Disposal Inc. site to beneath the Toxo Spray-Dust site. In order to evaluate this possibility, we recommend that vapor probes be installed and monitored. Three probes should be located along the northern boundary of the site and three in the area of the large building which is to be demolished for further development. The results of the vapor probes would be used to evaluate the necessity for vapor barriers in future buildings on site.

If you have any questions regarding this review, please contact us.

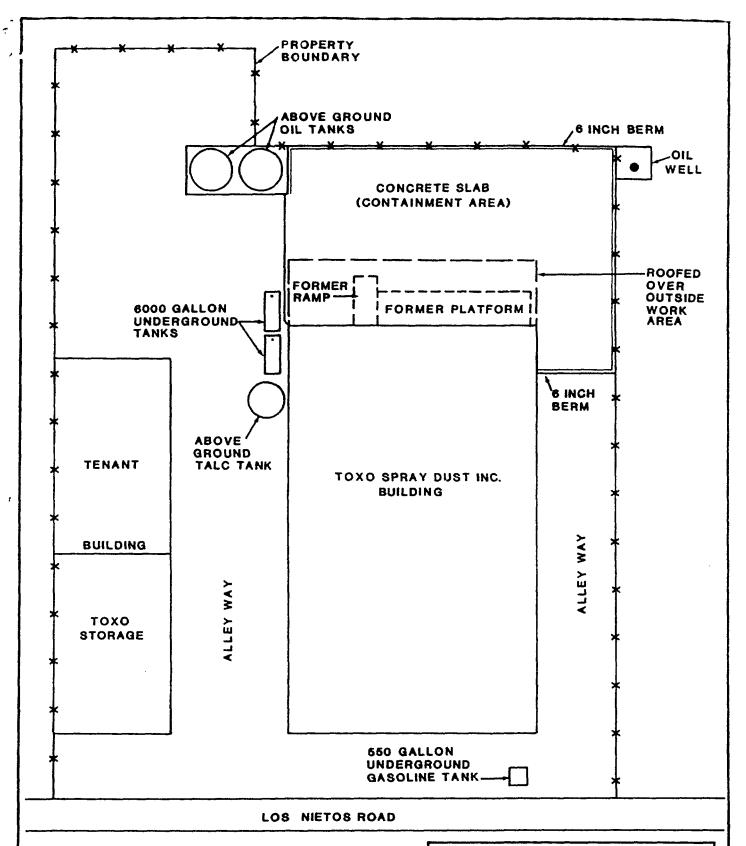
Sincerely,
DAMES & MOORE

Thomas A. Vinckier Associate

Robert E. Troutman Project Geologist

TAV/RET/kam







NOT TO SCALE

FIGURE 1

SKETCH MAP-TOXO SPRAY DUST INC. SITE

DRAFT

Dames & Moore